DEPARTMENT OF NATURAL RESOURCES

Appendix 3 Comments Received from the Public on the Revised Preliminary Best Interest Decision for a Long Term Timber Sale for Biomass Utilization in Tok, Alaska

December 17, 2012 to February 4, 2013

List of Commenters and Issue-Response Summary

Abbreviated Name	Commenter - Full Name and Affiliation (if any)	Date & Time Received
LMA	Brad Cox, Logging and Milling Associates	12/19/2012 - 2:39 PM Logged as 1/31/13 1245
Burnside	Roger Burnside	12/20/12 – 9:20 AM
USFWS	Nathan Berg, US Fish and Wildlife Service	1/9/13 - 4:45 PM
ADF&G	James Durst, Alaska Department of Fish and Game	1/14/13 - 11:56 AM
RGS-Nat'l	Dan Dessecker, Roughed Grouse Society, National	1/23/13 – 5:28 AM
	Kathy Morgan; Sue Stancliff; Shirley Kemper; and Dave Stancliff (TCOC)	1/23/13 - 8:00 PM – Oral Tok Public Meeting
Oldaker	Beckey Oldaker and Family	1/24/13 – 10:19 AM
Henton	Michael Henton	1/25/13 – 7:48 AM
Gabbard	Sandra Gabbard	1/28/13 - 1:00 PM
TCOC	John Rusyniak, Tok Chamber of Commerce	1/31/13 - 10:51 AM
Pendergrast	Don Pendergrast	1/31/13 – 6:20 PM – Oral
YTI	Joe Young, Young's Timber, Inc.	1/31/13 – 6:24 PM – Oral

Abbreviated Name	Commenter - Full Name and Affiliation (if any)	Date & Time Received
NAEC	David Arnold, Northern Alaska Environmental Center	1/31/13 – 6:28 PM – Oral
Miller	Jon Miller	1/31/13 – 6:32 PM – Oral
Brown	Linda 'Lou' Brown	1/31/13 – 6:36 PM – Oral 1/31/13 – 9:15 PM - Ltr
Maher	Kimberly Maher	1/31/13 - 6:40 PM – Oral
Deerfield	Thomas Deerfield, AP&T Consultant	1/31/13 - 6:44 PM – Oral
Burnham	Glenn Burnham, Burnham Construction, Inc.	2/1/13 – 12:30 PM
AP&T	Robert Grimm, AP&T	2/1/13 – 12:57 PM
Tanacross, Inc.	Robert Brean, Tanacross, Inc.	2/4/13 – 8:20 AM
Miller	Jon Miller	2/4/13 – 11:16 AM
Pendergrast	Don Pendergrast	2/4/13 – 11:16 AM
F&LM	Clare Doig, Forest and Land Management	2/4/13 – 11:16 AM
Odle-Moore	Kay Lynn Odle-Moore	Email 1/2/13 10:27 AM; Logged 2/4/13 – 11:30 AM
TCC	Will Putnam, Tanana Chiefs Conference	2/4/13 – 12:20 PM
RGS-W	Daniel Brewster, Roughed Grouse Society, Wasilla	2/4/13 – 12:20 PM

Abbreviated Name	Commenter - Full Name and Affiliation (if any)	Date & Time Received
Steen	Nick and Karen Steen	2/4/13 – 12:20 PM
TVC	Donald Adams, Tetlin Village Council	2/4/13 – 1:42 PM
Stark	Chris Stark	2/4/13 – 2:54 PM
YTI/TWFL	Joe Young, Young's Timber, Inc. – Tetlin Wood Fuels LLC	2/4/13 – 3:05 PM
NAEC	David Arnold, Northern Alaska Environmental Center [1st of 2 letters]	2/4/13 – 3:45 PM
Jenkin	James Jenkin, Golden Bear Motel	2/4/13 – 4:05 PM
NAEC(2)	David Arnold, Northern Alaska Environmental Center [slightly different ltr]	2/4/13 – 4:05 PM
AMF	William Wall, Alaska Moose Federation	2/4/13 – 4:39 PM
Harbison	Deb Harbison	2/4/13 – 4:54 PM
TVSF CAC	Tanana Valley State Forest Citizens' Advisory Committee – Resolution of Support	1/31/13 – 8:00 PM
FNSB	Paul Costello, Fairbanks North Star Borough	2/5/13 – 9:29 AM

Issue Response Summary

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Definitions	Def.	ADF&G	Definitions, pages 5-6: To help readers better understand what is proposed and why, we suggest adding a definition for the CWPP (perhaps with a referral to I.E.2) since it plays an important role in much of the document but is unfamiliar for many of us. In both public and agency discussions, it is evident that the "Tok triangle" is a concept of great importance to this sale and that likely will figure heavily in the final decision, but is used differently by different people. We recommend adding a Tok triangle definition, and clearly showing both it and the CWPP planning boundary on at least maps V and VI.	Reference to the "Tok Triangle" was omitted in the document to avoid confusion. This nomenclature has different meanings to different stakeholders in the area. The CWPP Planning area will be included as a map in the final BIF.
Definitions	Def.	YTI	"Definitions need to be addressed; some terms are omitted, less than professional, incorrect, or almost meaningless. Citations in text are not properly cited". P2.	Noted.
Public Comment and Outreach	1B.	TCC	"At the very least, we would hope that communication with the [affected] villages on the activities associated with this project remains open, and that their concerns on the impacts of increased access, potential trespass, and effects on subsistence resources are considered."	Noted.

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Public Comment and Outreach	1B.	TCC	"… we would encourage the division to work with local tribes and Native landowners on developing [local energy production and economic opportunities]." "We would encourage the Division to continue to work with us and Native allotment owners when planning operations in the vicinity of the allotment parcels."	Noted.
Public Comment and Outreach	1B.	Miller	"I believe DOF would produce greater benefits to the people of Alaska if they approached biomass harvest from a more rigorous sustainability perspective. It has been reassuring to observe widespread participation in the biomass discussion, and I look forward to DOF's expanded collaboration with a variety of interested parties, given widespread interest in sustainable forestry practices at UAF, energy efficiency at AEA and CCHRC, wildlife habitat protection at ADF&G, and sustainability thinking at NAEC."	The Division of Forestry is implementing an 'adaptive management' approach for maintaining long-term forest sustainability during biomass harvesting. This approach includes research into and monitoring of biomass harvesting and regeneration, then applying what is learned to continually improve forest management. The Tanana Valley State Forest Citizens' Advisory Committee, researchers at the University of Alaska, Department of Fish and Game, and others are playing active roles in this coordinated 'adaptive management' effort. DOF defines adaptive management as a systematic and iterative approach for improving sustainable forest management decisions and enhancing benefits by emphasizing learning from management outcomes. Adaptive management explores alternative ways to meet management objectives, predicts the outcomes of alternatives based on what is known, implements one or more alternatives,

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				monitors the outcomes, and uses the results to update knowledge and adjust management actions.
Public Comment and Outreach	1B.	TVC	"Why shouldn't the local Tribal governments, i.e. Village Councils, be consulted throughout the [road planning] process?"	Local tribal governments have been contacted and consulted along with public meetings conducted. Informal discussions have also taken place concerning this project and others. It is our intention to engage and involve them in the process for State timber sales and road construction.
Public Comment and Outreach	1B.	TVC	"Why has there been little, if any, public agency involvement, formal or informal with the local villages?"	There has been public involvement with villages and numerous further attempts have been made to determine if further meetings and involvement are necessary. Specifically, Danny Adams and Jeff Hermanns (Area Forester) had a lengthy phone conversation about the Tok Biomass Project and the Tetlin Gold Exploration Project.
Public Comment and Outreach	1B.	Stark	"Should native organization lands be involved? Would these lands be involved with Young's timber's bid?"	The timber management on Alaskan Native lands could have multiple benefits in the area. The participation would provide additional opportunity to achieve many of the BIF objectives as well as others relating specifically to Alaska Native land. The DOF does not directly manage Alaska Native land although commercial forest activity is required to conform to the FRPA.

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Public Comment and Outreach	1B.	NAEC	"The NAEC believes it is crucial that energy conservation and efficiency measures be combined with project development to reduce demands on the environment and to maximize benefits for the local community…. we urge DOF to engage the services of outside agencies and organizations experienced with energy conservation and efficiency (e.g., the Alaska Energy Authority, Cold Climate Housing Research Center, etc.) to make recommendations as to how electrical demand can be scaled to levels that are commensurate with sustainable harvest rates, realistic rotation periods, and approximately steady state biomass harvest areas after some target period (e.g., 75 or 120 years). Recognizing that this is not strictly within DOF's purview, we believe that this type of holistic approach is likely to create a far more socially useful and sustainable biomass industry forest-wide, and view it as a reasonable suggestion, much like DOF coordinates with ADF&G to achieve habitat conservation objectives.	Noted; mandating end use of forest products and product integration go beyond the scope of this timber sale Best Interest Finding and the authority of the Division of Forestry. Forest sustainability is independent of the end-use of the harvested fiber. While efficiency is important, and DOF seeks to minimize waste during the harvesting phase, DOF's mandate is to manage the forest sustainably; the market or governmental incentives typically are the medium used to change demand.

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Public Comment and Outreach	1B.	YTI	YTI requests that "the DOF would agree in writing, and work with and include YTI/TWFL and others, in an open and cooperative manner, as we offered to do verbally in September 2012, agree to a 30 to 60 day extension beyond the February 4, 2013 deadline, and address issues, YTI/TWFL would consider withdrawing their objection". P16-17.	The DOF is a public agency required by statute to operate in an open manner as a resource of the people of the State of Alaska. It is counter to this principle of open management of public resources to be uncooperative. The state has been developing and researching biomass and fire mitigation strategies for many years and specifically have been focused on developing a solution that fits Tok for the past two years. The DOF believes that it has adequate information to move forward with a decision.
Location	1C.	YTI	"Why is the west area involved in terms of reducing fire risk to Tok?" How come the area is not in the timber harvest plan? P6	The west area was chosen to augment the harvest area if it is needed once the primary objectives around Tok are achieved. The flexibility to adapt to changing conditions was desired from the outset of the project planning. Harvesting even in this area will provide flexibility to wildland fire tactics if fire is moving across the landscape near Tok. Harvesting may occur in a similar prescription as depicted in the primary areas if it is considered needed for the contract volume or a forest management objective that develops.

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Objectives	1D.	YTI	The objectives of the sale are questioned due to the way they are written. He suggests from his perspective of the stated goals, a different manner of presentation if the prime objective is to reduce the fire hazard in Tok. P6	Noted
Objectives	1D.	YTI	Was the driving force behind the May 2012 proposed sale described in the first Preliminary BIF the protection of Tok from wildland fire or supplying biomass to APT for power generation? If it was to supply biomass why was it developed in a vacuum, offered as a negotiated sale to only APT? This put YTI at a district disadvantage. P15.	The Tok BIF was developed to solve a number of objectives. The one objective that precipitated the processes was the desire to improve the defensibility of Tok from wildland fire. The secondary objective that fostered the initiative is the mandate of the ADNR "To responsibly develop Alaska's resources by making them available for maximum use and benefit consistent with the public interest." The interest from APT lead to the initial offering depicted by the May 2012 Preliminary BIF. YTI's assertion of parallel interest has caused the DOF to reevaluate the method of sale and revise the Preliminary BIF. The DOF has a long history of dialog with YTI on forestry issues in Tok because of YTI's efforts in the industry and community.
Planning Framework	1E.	TCC	"… we encourage the State to remain flexible as possible in planning its long term operations so as to positively respond to improved management as time goes by."	The State will utilize an 'adaptive management' approach to seeking and incorporating new information to improve its forestry operations.

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Planning Framework	1E.	YTI	Requests " A simple, brief chart showing the procedural steps (flowchart) from this step (Preliminary BIF to an actual on the ground sale including FLUP, FYSTS, timber sale layout, volume data calculations, site prescription, and timber sale advertisement and awarding" P3.	See BIF (new Appendix 2).
Planning Framework	1E.	YTI	"Does a FYSTS exist?" asks if this is a legal order for the timber sale to occur by publishing a BIF prior to a FYSTS. P3.	The previous FYSTS was published in 2009 and reflects some of the areas contemplated for harvest in this BIF. The FYSTS for the Tok Area is due to be updated. Per AS 38.05.113, the FYSTS will be published prior to the actual sale of the timber and describe where timber will be potentially sold for the next five years. Past timber sales in Tok generally have not required their inclusion into the FYSTS due to their size (AS 38.05.113 (c)). The DOF seeks to meet the statute's intent although and has included the majority of the timber sales offered regardless of their size in past FYSTS. The DOF has delayed the FYSTS revision for Tok in the interest of it being representative of likely activity.

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Legal Authority	III.	AP&T	The statement as made in the middle of Section 4 is not correct; a CHP facility run by an independent producer has to deal with regulatory oversight, possibly including a Power Purchase Agreement with AP&T.	Noted. The DOF is aware that the actions of a public supplier of power are regulated. The point of the section was to impart the flexibility that a regulated biomass CHP "facility" has in establishing the economic window for the power it produces relative to the process that a regulated "utility" undergoes. The section simplified a relatively complex subject.
Legal Authority	III.	TVC	"Therefore, such areas where there is harvesting within the Best Interest Finding should be considered to be defined as non-hunting areas for a number of years, to help with the influx of hunters and harvesters that will have increased access."	Wildlife and moose hunting regulation responsibilities fall under the authority of ADF&G and the Board of Game, not DOF's BIF process.
Legal Authority	III.	TVC	"The Best Interest Finding should consider requesting ADF&G to establish a temporary or even permanent no hunting surrounding the community of Tok, for safety reasons and to allow moose population to reestablish itself and multiply."	The Division of Forestry actively consults with the Alaska Department of Fish and Game about protecting or enhancing fish and wildlife habitat; the DOF does not have authority with Board of Game regulatory issues.
Discussion of Issues	IV.	Miller	"I urge you to think carefully about long term *sustainability* of this type of project, both in terms of ongoing economic viability and environmental impacts."	Noted.
Discussion of Issues	IV.	Miller	"While energy efficiency is not a responsibility of DOF, like your concern for other statutory requirements that affect forestry decisions, it should be incorporated as part of future biomass harvest planning."	Noted.

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Discussion of Issues	IV.	Stark	"How is grass to be controlled in those clear cut areas?"	Grass has not been a problem in the Upper Tanana within harvest units. The plan is to require scarification post harvest in the same season following the harvest of the unit. The objective is to promote natural regen of aspen and spruce quickly prior to any grass becoming established.
Discussion of Issues	IV.	NAEC	"…we are also concerned about long-term health and sustainability of the Tanana Valley State Forest (TVSF). A 25-year contract of forced timber sales would result in new roads and will impact riparian areas, fish and wildlife habitat and other local uses, such as subsistence, availability of firewood and depletion of saw timber."	The Division of Forestry is implementing an 'adaptive management' approach for maintaining long-term forest sustainability during biomass harvesting. This approach includes research into and monitoring of biomass harvesting and regeneration, then applying what is learned to continually improve forest management. The Tanana Valley State Forest Citizens' Advisory Committee, researchers at the University of Alaska and Department of Fish and Game, and others are playing active roles in this coordinated 'adaptive management' effort. In addition, FRPA regulations provide riparian areas and fish habitat with significant protection from potentially adverse impacts associated with timber harvesting activities through required stream retention zones, road building guidelines, regeneration requirements, and close coordination with ADF&G.

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Physical Characteristics of the Sale Area	4A.	Odle-Moore	"Along with the roads (and the erosion from putting them in), I'm very concerned about the erosion in areas where black spruce is removed. Black spruce trees usually are growing in areas of permafrost. Past experience with such areas tells us that once that permafrost area is disturbed … and the top area becomes a quagmire."	Areas of permafrost generally do not grow stands of trees fitting into the envisioned harvest plan prescription. Further more permafrost is scattered in the area due to the soils being well drained and the topography is generally flat. Due to the combination of these factors, erosion potential is considered low. The FLUP will be used to identify problem areas, design for them ahead of time and FRPA best management practices will also be instituted.
Physical Characteristics of the Sale Area	4A.	Stark	"The project area biomass estimate is compared inappropriately with the TVSF and Forested lands in Table 1 of the BIF. Where is the acreage data for the proposed project area? "	Total project area is indicated on Map III as "Total Gross Area = 85,376 Acres". Table 1 Grand Total Acres of 65,117 is forest land only. An additional burned and Non/Forest Other of 5,375 and 14,884 acres respectively is included in the Total Gross Area.
Current Land Use	4B.	Pendergrast	"Emphasize identification, measurement, and protection of existing characteristics, values, and multiple uses of these public forest lands…"	FYSTS and FLUPs will be used to identify and manage these issues.
Current Land Use	4B.	YTI	YTI highlights three areas in the project area that has been used for research and should be protected for future research. He asks why these are not referenced and how they will be protected? P12.	DOF is aware of all three areas and the significance of the research. The DOF has worked closely with UAF Forester Tom Malone for years to insure the protection of the areas. The DOF contacted Mr. Malone and he suggested an one hundred foot buffer.

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Sustained Yield and Allowable Cut	4C.	ADF&G	Objective 4, Proactive forest management, page 9: For clarity, we recommend rewording this objective to such as, "4. Proactive timber management. Improve timber growth and vigor by harvesting and replacing mature stands with new healthy stands, while protecting and maintaining other forest resources. The actions authorized under this decision will adhere to multiple-use management principles and, as appropriate, the site specific management objectives and guidelines developed by the Tanana Basin Area Plan, the Tanana Valley State Forest Management Plan, Forest Land Use Plans, and other applicable DNR decision documents."	Noted.
Sustained Yield and Allowable Cut	4C.	ADF&G	Tanana Valley AAC, pages 12-13: Our understanding is that the Parsons 2000 report does not include an adjustment mechanism for large-scale changes to stand inventory and rotation such as the 2004 fire season and the fall 2012 wind event. In light of these known events, this seems like a good place to describe how the AAC from the report is adjusted for such past and future large-scale events.	The TVSF is undergoing an inventory update. Updated timber typing for the Tok Management Area is complete and a revised AAC will be calculated for Tok. This will incorporate burned areas since the original AAC was published. Changes in the TVSF and Forest Classified land base will also be reflected in the update.

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Sustained Yield and Allowable Cut	4C.	ADF&G	Biomass Inventory (State Land), page 14: Are we understanding this section correctly, that the "total standard deviation" for 630 plots at 7.9% translates to a standard error of (3,393,000 green tons x 0.079)/(630^0.5) = 10,679 green tons?	The 7.9% sample error is based on the live gross cubic foot estimate by strata and combined. It is given within one standard deviation of the mean. Thus for a total CCF volume of 596,932 CCF, there is a 68% chance (one standard deviation) that the estimate is plus or minus 47,158 CCF.
Sustained Yield and Allowable Cut	4C.	Stark	"Tok area has 3100 acres per year available for forestry on a sustainable basis. This assumes all is available to biomass, which is not the case due the seven mile radius limit due feasible constraints stated by ATP at CAC, but not mentioned in BIF. Not even all the project area is within seven miles (Dot Lake tract). So how is this project sustainable?"	The annual allowable cut of 3,100 acres has been established for the entire Tok Management Area. It is the basis for determining sustainability for this area of the state forest. Operating in the smaller radius near Tok is due to the fire risk present in this area.

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Sustained Yield and Allowable Cut	4C.	Stark	"The biomass estimate is possibly bias based on weak, far reaching, and potentially inappropriate data (and sets), collected by the local forester who may have (un-intentionally of course) potential for professional/personal conflict (and who is very much a promoter of this specific project). A standard deviation of 7.9% is perhaps an unusually "tight" out come, and there is suggestion in the BIF that the sapling site assessment will change the biomass estimate. It seems from the maps in the BIF that the majority of the project area is sapling classified thus I suspect the total biomass estimate may be over stated. Eyeball estimates suggest 90+% of this area is sapling classed. There are virtually no or some where near almost no biomass estimate data is used to represent this large area of the proposed harvest area. Please clarify the soundness of this rather extensive expansion of limited data (as presented in the BIF).	The inventory estimate for the sapling size class is explained in the DOF report titled "Biomass Supply Analysis For the Tok Area" available from the DOF Northern Region Office. To calculate the sapling volume estimates, plots installed at Tok by the USDA Forest Service in 2009 were utilized. A total of 24 fixed plots were sampled. When the Tanana Valley State Forest inventory update is completed it will include reproduction stands sampled by State Forestry (DOF) during the summer 2012. Additionally, several one-acre sample harvest blocks of biomass removed near the Tok School within the sapling timber type, correlated well to the inventory volume per acre estimates.
Sustained Yield and Allowable Cut	4C.	Stark	"I do applied *(applaud)* the use of the 125 year rotation in this projects sustainability aspects."	Noted.

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Sustained Yield and Allowable Cut	4C.	NAEC	"Adaptive management regimes will be critical in finding the correct balance between gaining knowledge to improve management in the future and achieving the best short-term outcome based on current knowledge. A management plan for biomass utilization in the TVSF must include contingencies for climate change, wildfires, insect outbreaks and other unknown future scenarios."	Noted.
Sustained Yield and Allowable Cut	4C.	NAEC	"The scale of harvest, both annual cut and overall footprint of the project over many generations should be designed to allow many successive harvests over long rotation periods. Implementing energy efficiency measures to reduce the amount of space heating and electrical demand is a highly relevant consideration to the sustainable use of slow-growing northern forests."	Noted.
Sustained Yield and Allowable Cut	4C.	YTI	YTI questions if there are different rotation ages and what they are? The BIF does not make the distinction as to what will be used with each stand type and why. He asks for the information to be placed in the document not in a reference that is generally referring to saw log timber types. He asks for acknowledgement of the sites that are not capable of producing saw logs and a description of the end product size and rotational age for the area. P9.	Rotation ages utilize 120 years for spruce and 70 years for hardwood. These ages form the basis of the sustained yield calculations for TVSF and Forest Classified lands. Future end products of second growth stands will likely be similar to their present capability as biomass. The actual quantity of mature stands not capable of saw log size growth is not able to be definitively stated.

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Sustained Yield and Allowable Cut	4C.	YTI	Determination of true cost of biomass is not clear. What is meant by "reforestation costs are not anticipated to be significant"? Is there money in the State reforestation fund? Who is responsible for reforestation? What is the goal of reforestation? What will the new forest be used for? What specific experience does DOF have with landscape reforestation in this area? What reforestation data does DOF have for this area? How many acres needing reforestation are potentially involved? What kind of site preparation is envisioned and what does it cost? P10.	The State reforestation fund has not been funded; to date it has not been used as a funding mechanism for reforestation. The DOF instead has used the Timber Sale Receipt Account as needed. Harvested areas will be monitored for reforestation success and will meet the standards set out in the Alaska Forest Resources and Practices Act. The FLUP will contain specific site management plans for regeneration. Requirements for reforestation/site preparation will be contained within timber sale contract documents. The State is responsible for regeneration adequacy. The DOF bases its reforestation perspective on the regeneration seen in past Tok Area timber sales and burn areas. Regeneration has not been a problem especially with a moderate amount of scarification that can generally be accomplished during or post timber harvest. Devices such as a roller chopper can be used for this purpose if necessary. The State does not think that reforestation will be an issue on most sites. The goal of reforestation will be towards a less combustible fuel by encouraging aspen growth. In lieu of aspen growth on forested sites, spruce will readily regenerate. If necessary, roller chopper costs will be $50-70/ acre.

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Stand Conditions	4D.	ADF&G	We believe there would be great utility in separating the text in this decision document into its two rather distinct project components: the Tok triangle land use conversion/hazard fuels reduction project and the long-term biomass supply project. The two projects may overlap in time and purpose, but seem to have little overlap in location or silviculture.	Noted.
Stand Conditions	4D.	Tanacross	Discouraging browse by moose and hares when stands are being established may have unintended consequences for overall habitat improvement under Objective No. 5. How will regeneration goals be assessed, in particular, prior to the free-to-grow stage for hardwoods?	The areas that will be harvested under this sale are biased towards higher concentrations of spruce. Efforts to encourage hardwood regeneration will likely attract some moose. Adaptive management will be used to adapt existing mitigation techniques to maintain or enhance the habitat potential. Regeneration goals will be assessed based on the FRPA guidelines and reforestation handbook.
Stand Conditions	4D.	Stark	"Does proactive forest management promote realized habitat improvement or just shift to a different type of habitat which at the onset seem to be an improvement?"	The habitat improvement for certain species is a secondary objective. Ultimately the DOF seeks to improve or do no harm to the habitat as a whole. Forest stands are in a constant state of flux and are mixed in composition. The DOF recognizes the variety of habitat values and will work with ADFG on this issue to develop implementation strategies and measure their effectiveness.

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Stand Conditions	4D.	Stark	"Appendix A (ref. for biomass information) seems to indicate that the most minor timber types in the proposed project area (saw and pole spruce timber) are driving (largest number of sample plots included in analysis) the analysis outcome and the most common timber type (sapling) was not included in the BIF biomass analysis. But will be in the future."	See Stark comment above for Sustained Yield and Allowable Cut.
Stand Conditions	4D.	YTI	Are sapling stands not targeted in order to allow them to grow more and have more volume in the latter half of the proposed contract? P6.	Sapling stands will be harvested and are present in all years of proposed harvest. Generally harvested areas progress from Tok outward focusing on areas providing the greatest hazard fuel mitigation efforts initially.
Stand Conditions	4D.	YTI	Questions the definition of "mature stand" in the context of the BIF. He asks if it is applicable to pole timber. Asks what site conditions will allow conversion to less combustible forest fuel types? How many seedlings per acre is the desire? What is the envisioned rotation age and cutting cycle? What documentation does DOF have that regeneration is adequate? What forest information specific to the Tanana Basin River Basin does DOF have? What documentation is there regarding regeneration? Trees per acre? distribution? What assumptions does DOF use in determining rotation age? P7.	The timber types represented in the inventory are described by size class to give an indication of stocking and timber size characteristics. Many of the stands regardless of the size class are mature based on the rotation age. Much of the Tok adjacent stand included in this project is grossly overstocked; this has significantly limited growth of the trees. Many 3" DBH trees are over 100 years old. So even though the stand is typed sapling the stand is relatively old and tree growth is stagnant. This again is mostly due to the overstocking condition of these stands. Large openings will be created to adequately warm the soil with possible

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				additional scarification required to stimulate the aspen coppice sprouting. The rotation age is 120 years for spruce with possible shorter rotation depending on site conditions and species. Good sprouting of aspen is occurring in fuel reduction sites harvested on the north side of Tok with natural spruce regeneration also prevalent. Timber harvests have occurred in the Upper Tanana since 1940's with good regeneration observed in all areas. We are not aware of any area in the Upper Tanana that has not satisfactorily regenerated into forest. Regeneration surveys for harvested areas have been conducted along the Tok River (Putman 1995) and upland sites near the Taylor Highway. In both these areas post harvest regeneration exceeded FRPA standards. Areas closer to Tok including past timber sales and hazard fuel reduction areas near Red Fox Drive are also exhibiting good regeneration. The presence of aspen will be encouraged and used as an indicator of potential for conversion to less combustible timber types.

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Stand Conditions	4D.	YTI	YTI is concerned about the lack of science presented in the BIF and the transference of science from elsewhere to the area. The regeneration process is not well understood. Specific regeneration questions are asked about the white spruce, black spruce, birch, aspen and Balsam Poplar. “How typical are silt loams in the Upper Tanana Valley? How do silt loams compare to the elsewhere in the interior and south-central Alaska? How deep is the rooting zone? How well do the five species compete with grass or will parts of the sale area become a "sea of grass"". P12-13.	See above comment. For areas closer to the proposed project area, the 1990 Tok fire provides good evidence of extensive aspen regeneration.
Stand Conditions	4D.	YTI	What is the method used to suggest that regeneration is usually satisfactory following harvest? So what data exists regarding regeneration and free to grow for sites within the sale area? Were regeneration surveys carried out? If so what are the results? The information appears to be speculative. What if a harvest area does not regenerate adequately to meet the needs of the future? Is there intention to plant? The AK Reforestation Handbook is not mentioned. Two year conifer seedlings and most hardwood seedlings are not established or in a position to grow freely. YTI challenges the blanket prescription for encouraging aspen suckering and is lead to believe that site specific prescription has not been thought out	See above comments.

Category	Sec in PBIF	Commenter	Comment	DOF Reply
			and will not be done adequately. P14.	
Stand Conditions	4D.	YTI	"the most important " (objective) "is to decrease/reduce fire wildland fire risk. This should be the driving force for the biomass fiber sale." TYI describes the flammability of grass and its potential to pioneer harvested areas. YTI is of the opinion that methods to control grass need to be addressed in the BIF in this light of potentially creating more of a fire risk than is being eliminated.P15.	The DOF has recently harvested over 200 acres on the north side of Tok. There has been some grass present in these harvested areas but it is not a significant fuel source for carrying a fire. This is a temporary state of regeneration of the site as is evidenced by the aspen sprouting quickly above the grass with spruce seedlings showing good growth below. The DOF wildland fire technicians have reviewed the grass and are comfortable that the grass component currently established is a manageable fuel type. The goal and management objective is to as quick as practical after harvest, perform any site prep needed to encourage this type of aspen sprouting.
Stand Conditions	4D.	YTI	"open grown, scattered, or clumpy stands" do not appear to be in the inventory and are not part of the harvest plan? If the primary reason for the BIF is the protection of Tok why are these stands not being treated as well? How will these noncommercial stands be treated? P15.	Timber types that comprise the inventory and are within the project area include closed (60-100% density), open (25-59% density), and woodland (10-24% density) stands.
Stand Conditions	4D.	YTI	If sapling and pole timber are harvested for biomass, then there is nothing left to grow into the saw timber sizes needed by YTI. The growth of trees to saw log size has not been addressed in the document. This lack of Sawtimber will put YTI at a disadvantage.	Timber types within the project area comprise a wide range of stand ages. Much of the sapling and pole timber types are relatively old with pole timber averaging up to 160 years old. Timber harvest will be designed to leave patches

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			P16.	that are true young growth while harvesting older trees. Specific objectives for hazard fuel reduction may however overrule. Harvest specifics will be identified in individual Forest Land Use Plans. Generally saw log trees are being sourced from the Tok River which is being managed for sawtimber production. Considering that the Upper Tanana is a fire ecosystem, the ultimate prohibiting factor of timber reaching saw log size is the occurrence of large landscape wildfires. We are planning to breakup the continuous spruce fuels in our forest stands adjacent to Tok. With 40% retention per area harvested, the younger and larger stands will be left for management for future biomass and saw log harvest. Without significant investment in intensive forest management activities such as thinning these naturally overstocked stands, the current sapling and pole timber will not automatically become saw log timber. Currently the economics and funding are not available to conduct release cuts. Thus 50 years from now most of the stands if not burned, will not look much different than they do today.

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Wildland Fire Management	4E.	ADF&G	<u>Objective 5, Habitat improvement, page 9:</u> The clause, "that is more diverse than the present configuration that is a product of fire suppression activity" does not appear justified without a context of scale, definition of habitat diversity, or data to demonstrate it. As far as we know, the appropriate biological data have not been collected and analyzed. We agree that fire is the predominant upland disturbance to which wildlife has adapted in much of the Interior, but the landscape-level effects of fire suppression on the natural range of stand types and age classes is unclear, and may well depend on stand type and location (for example, riparian white spruce stands compared with mature black spruce stands on permafrost). This assessment may be more applicable with respect to mature black spruce stands in the immediate footprint of the community zoned as Critical for fire management. However, it is more in question for the areas farther away from Tok and Tanacross, as witnessed by the footprints of the 1990 Tok fire and 2010 Eagle Trail fire.	Noted and changed in the BIF.

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Wildland Fire Management	4E.	Stark	"Should fire protection be the primary objective of the sale, if after the first 10 or so years, the danger is mitigated?	Fire protection is a dynamic goal that will likely change over the life of the contract. Wildland fire management is often a function of available resources. Additionally, the more remote upland areas are designated as a Limited fire protection area, where wildland fires are allowed to burn rather than aggressively suppressed. This policy, as enumerated in the Alaska Interagency Wildland Fire Management Plan, encourages the role of fire in the boreal ecosystem. Typical suppression efforts are protection of human life and "point protection" of certain types of structures and land classifications (Native allotments). Fires are actively monitored and broader suppression efforts may be undertaken if areas designated for Critical or Full fire protection are threatened. This policy results in large acreages of burned area in Limited protection areas, especially when compared to acreage in Critical and Full protection areas, thus it is difficult to estimate future acres burned in the project area. Historic data is the best proxy we have for estimating wildland fire risk to the project. (see Section E. Fire Hazards, Wildland Fire Management and Fire Suppression Costs and Definitions section in the BIF).

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Wildland Fire Historical Costs and Projection	4F.	Stark	"Fire hazard reduction is very important, but using the total burned over the last 65 years for an average of 3,200 acres burned per year is likely an underestimate of the fire loss due in increased prevalence of fire in more recent years. The maps indicate that the burned area is far greater then the project area (visual assessment of map X). Is the Fire danger correct enumerated and characterized?"	The fire history data has been generated by the Alaska Fire Service and is the best available layer. Upland sites north of Tok are likely in a more active lightning zone than areas within the project area.
Wildlife Habitat	4H.	Steen	"I recall a study, which I cannot locate, from Eastern Canada which determined that moose utilization of regrowth greatly diminished 300 meters of [sic] more from escape cover. I suggest you keep this in mind when laying out cut units."	Noted.
Wildlife Habitat	4H.	Steen	"I do not believe the Board of Game has the authority to close roads. … that authority remains with the land managers, i.e., DNR."	The Board of Game has the authority to restrict the method of access used in the pursuit of game species. This is termed a "controlled use area". The actual physical closure of a road generally resides with the owner of the road and potentially (who may or may not be) the land owner.
Wildlife Habitat	4H.	USFWS	Submitted three articles for references: Brudvig et al 2009; Fisher and Wilkinson 2005; St. Clair et al 1998	Noted.
Wildlife Habitat	4H.	USFWS	"Maintain forested "leave strips" along the corners of harvest units to physically connect residual forested areas. These ..will..act as corridors for many species…"	Noted.
Wildlife Habitat	4H.	USFWS	"Leave peninsulas of forested habitat between unharvested areas and your smaller	Noted.

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			leave stands..."	
Wildlife Habitat	4H.	USFWS	"Reduce fragmentation and increase forested patch size by closing, rehabbing and encouraging tree regeneration on interior roads and skid trails."	Noted.
Wildlife Habitat	4H.	USFWS	[Couple other habitat related suggestions that may best fit in a FLUP.]	Noted.
Wildlife Habitat	4H.	ADF&G	Projected habitat, 3rd paragraph, page 23: The first sentence of this paragraph needs to be adjusted, particularly for portions of the project area outside of the Tok triangle. Critical habitat for wildlife is defined not only where it is located on a landscape, but is also based on known value to fitness (reproduction and survival) for a species. Since we lack specific information about fitness for wildlife species in the project area, a more accurate statement to convey the intent would be, "Wildlife use of much of the proposed contract area is presently driven primarily by wildland fires in uplands and fluvial action (inundation and ice scouring) in floodplains." This description and a slight change in the subsequent sentence on accommodating habitat during forest management ("…may need to be implemented, including habitat enhancement, to accommodate…") will make the paragraph consistent with the goals	Noted.

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			for fish and wildlife habitat in the TVSF Management Plan (2001:14) to "provide for the diverse needs of fish and wildlife resources" and to maintain "the natural range of species and habitat diversity."	
Wildlife Habitat	4H.	Pendergrast	"Cooperation with USFWS to provide protection of the long standing bird banding effort along the Alaska Highway at the "tank farm.""	Locally important wildlife research projects and similar location-specific concerns such as trails are typically addressed during public planning and agency participation for the required Five Year Schedule of Timber Sales (FYSTS) and Forest Land Use Plans (FLUPs) that take place prior to harvesting.

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Wildlife Habitat	4H.	Pendergrast	"Efforts to deal with projected habitat should include management of invasive or undesirable species like grass(*calamagrostis*) which may inhibit the desired regrowth, maintenance of late seral features (large or dead trees which provide important habitat,) maintaining as much lichen cover as possible."	Locally important habitat types associated with late seral stages are best addressed within the FYSTS/FLUP processes in conjunction with a broader 'adaptive management' framework designed to address longer-term issues and landscape-scale effects associated with major biomass harvesting projects.
Wildlife Habitat	4H.	AMF	"One concern of AMF regards the placement of the harvest sites in the landscape; specifically, the proximity of harvest units to highways. However, with appropriate planning, this issue can be resolved. Our goal would be to have moose drawn from ROWs during migrations or during winter habitat utilization. We believe that the harvest units should be a minimum of a quarter mile from the ROW of a major highway. The timing of the harvest and creation of habitats near a major highway should reflect the habitat conditions on the adjacent ROW. Since DOT&PF is the agency responsible for the clearing and maintenance of ROWs, coordination with DOT&PF on their maintenance schedule and timing of biomass harvest should be considered. If DOF creates high quality moose habitat within a quarter mile of the major highway and the condition of the ROW is already high quality habitat, then there is a greater risk of increasing moose on the highway. If the ROW is	Noted. Currently no harvest units are planned within 1/4 mile of any highway. It is understood the desired result would be to draw moose away from highway corridors.

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			maintained free of high quality moose browse, the habitat DOF creates away from the highway should act as an attractant and help hold moose away from the highway."	
Cultural Resources	4N.	TVC	"Will local Tribes and Tribal organizations have any input on the [proposed cultural resources] assessment model designed for the Best Interest Finding?"	Yes
Harvest Methods	4P.	ADF&G	Projected habitat, 4th paragraph, page 23: We believe that the monitoring process in the first sentence could be clarified with some parenthetical inserts: "…it will be important to understand the present (pre-treatment) conditions and be able to forecast future scenarios (post-treatment responses as testable hypotheses) based on clearly stated assumptions developed in coordination with DOF." Prior to the last sentence, insert "ADF&G will work with DOF to design evaluations of preliminary BMPs for biomass projects across the Tanana Valley as feasible through staffing, funding, and research priority."	Noted.
Harvest Methods	4P.	Pendergrast	"Nutrient cycling questions: Should alder growth be encouraged in order to replenish nitrogen ion the soil? Would distributing the ashes from the boiler back into the harvested areas help replenish nutrients?"	Yes, both of these tactics will be used if determined to be necessary.
Nutrient Cycling	4Q.	Stark	"The BIF suggests that whole trees will be removed, including leaves and branches, and	Based on past harvest activities of fuelwood and saw logs there has not been

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			processed at the plant in town, thus removing nutrients from nutrient poor sites. I suspect removal of the main above ground nutrient source (leaves and branches) is a bad idea. I have not read in the BIF that alder or fertilization is part of the picture for nutrient reconstitution. The project area lands are well drained and have relatively thin soils (nutrient poor) I am told. How are the nutrient losses of whole tree extraction being mitigated, and scientifically characterized and documented?" The BIF states "Certain soil types are prone to poor nutrient availability to vegetation. Thin, porous soils have a tendency to leach needed nutrients while poorly drained soils are less likely to decompose the organic layer subsequently not making nutrients available to growing plants. The identification of these soils types and the potential effect of nutrient removal from these sites will be considered in the Forest Land Use Plan harvest prescription." Several items in these statements of nutrient loss mitigation are not part of the BIF prescription, and/or very unclear. Please explain in detail the known and unknown aspects of nutrient loss mitigation."	evidence of nutrient decline. Most of these past sales contained prescriptions for whole tree harvest with tops decked at designated landings. Whole tree harvest will remove less than 10% of site nutrient content of interior Alaska forest types (Van Cleve and others, 1983). For nitrogen, N fixation by alders should replace N loss from timber harvest by 40 years (Mitchell and Ruess, 2009). Soil phosphorus is not believed to limit forest productivity in interior Alaska (Valentine and others 2006). Exceptions are weakly weathered parent material, sand or gravel soils of dunes or floodplains, or very poorly drained black spruce stands. Timber harvest is generally not expected on these soils and will be given special planning if these soils are encountered. Leaching of mineral nutrients following timber harvest is unlikely due to low precipitation in interior Alaska. Even following heavy fire, loss of nutrients by leaching is not significant due to low precipitation (Dryness and others, 1986).

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Nutrient Cycling	4Q.	YTI	How do the characteristics of these soils compare to those soils studied by VanCleve et al. (1979)? Why is birch cited when birch is not abundant and black spruce and white spruce predominate? With low precipitation and the loess-outwash gravel interface how deep will the nutrients leach? No mention of what will be done if nutrient leeching is deemed an issue. P8.	Natural regeneration is expected to be established relatively quickly due to the presence of aspen in many of the stands. Regeneration of trees and shrubs will mitigate nutrient leeching.
Transportation	4R.	Brown	"First, the cost of construction, reconditioning or maintenance of roads doesn't seem to be taken into account… Would this calculation be included in the FLUP?"	Yes
Transportation	4R.	Tanacross	Tanacross, Inc. has not been able to identify an easement for the road locally-known as Rufus Road. DOF and the successful bidder should negotiate with Tanacross Inc., as an adjacent landowner, before that road is identified or used for access to the Eagle Trail Harvest Area.	Noted.

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Economic Effect on Current and Projected Forest Resource Use	5C.	AP&T	Further, the State should credit this project for the avoided costs of wildfire prevention and fire suppression that will be realized by this project effectively performing the hazardous fuel reduction anticipated in the Tok Community Wildfire Protection Plan. If the State had to pay for hazardous fuel reduction on State lands in the Tok area, the cost would be in the neighborhood of $1,500 per acre.	The legislature has not authorized the expenditure of State funds to perform fuel mitigation. The cost savings of fire suppression due to fuels mitigation is speculative but well established as a tool for providing fire managers options. The savings are not realized until a fire occurs. Fire suppression is a responsibility and cost that can be transferred or mitigated rather than eliminated. The return on the money expended depends on a number of variables that change over time. Per 11 AAC 71.092 (d) the DOF evaluates the relevance of the purchaser's operating costs on the value of the resource when it determines its market value. In the event it is appraised at a negative value, the benefit of the selling the resource at some minimum value is considered in the decision with the other benefits realized or perceived by the State.
Economic Effect on Current and Projected Forest Resource Use	5C.	TVC	“Please explain and clarify how round logs, cordwood, and saw logs found within the sale area will be used and compensated, in a way that will not undersell Native-owned wood.”	When the State appraises its timber, the price is generally based on market value. Market value is a function of the end product value and the costs of delivering the timber to the market. In a competitive sale environment, the price will reflect the market.

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Economic Effect on Current and Projected Forest Resource Use	5C.	Stark	"The APT feasibility study uses a $1/GT cost and I believe Tom Deerfield suggested the same. Is it really fair to charge the school more?	The DOF and the Department of Education, Gateway School District negotiated this sale for decked timber from fuel reduction project harvested under federal grant funding. The stumpage for this sale does not relate in any terms with the proposed Tok Biomass sale. The nominal stumpage from the Tok School decked wood sale is meant to cover the cost of administering the sale and the burning of any remaining slash piles by DOF personnel.
Economic Effect on Current and Projected Forest Resource Use	5C.	Stark	"How will present contract holders be compensated for the decrease in value of stumpage (assuming $1/ton is less than the stated state minimum of $4-5/ton that the state needs to met it's cost to deliver the resource) or will the state operate this as a loss and not have a level cost across users and industrial operations?"	The price of the resource has not been established. The resource is a combination of material types that have different and varying values. The prices mentioned are hypothetical. The DOF proposes an adaptive management style for this contract due to its pioneering nature. The DOF thinks this is a proper perspective to take. Per 11 AAC 71.092 (Pricing for sale of timber) all contracts developed by the DOF have clauses for redetermination of the appraised price at defined intervals to represent fair market value.

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Economic Effect on Current and Projected Forest Resource Use	5C.	YTI	"Best Interest Finding: How is this defined? YTI asks why the information he presented to the BOF in 11/2012 on employment at his mill and projected development not compared to APT's projected employment. P4.	There is no single or comprehensive definition established by statute or code that fits the term "in the state's best interest" for every occasion. It is generally construed to mean a determination that is reasonable under the circumstances and is neither arbitrary, capricious, nor prompted by corruption. The DOF used a conservative representation of the expected employment if the resource was developed. The DOF took this perspective since the resource has not been utilized in the manner envisioned in the BIF to date in Alaska.
Economic Effect on Current and Projected Forest Resource Use	5C.	YTI	"The action as outlined is in the choicest locations." This will restrict the ability of YTI or another operator to compete economically in the local market with the resource being tied up in another contract. The ground is the "choicest" "Is this fair to the already existing timber business in the area? This creates a tradeoff: potentially lower electrical rates and higher wood heating costs. P5.	Much of the project area is specific to the objective of reducing hazard fuels. As the project progresses away from Tok, it will target the mature and over mature trees while retaining more desirable young growth. Stands of significant saw log timber are not the target of the project. Some harvest of saw logs will occur incidental to the biomass harvest but they are not the objective unless they are considered a fire hazard. Most of the significant saw log stands are in the river flood plains and will not be utilized in this timber sale. The majority of the volume harvested would be the sapling type and has not been requested by any entity for a timber sale until recently. The few saw

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				log stands encountered will generally be bypassed and potentially put up for sale in a separate sale process.
Economic Effect on Current and Projected Forest Resource Use	5C.	YTI	Will pole timber grow into Sawtimber? If so why are we harvesting it prior to that point? He considers this high grading and taking future saw timber away from one operator in the future to benefit another now. He believes the act would be supporting a state supported monopoly. P6.	See previous response to this issue in Stand Condition responses.
Method of Appraisal	5D.	AP&T	Method of Appraisal (page 31-32): The fourth bullet point states: *"The collective stumpage due the state will at a minimum recover the costs to the State of preparing and administering the sale."* The State should seek to minimize its administration and preparation costs by: a) having the purchaser provide the road location and layout for harvest areas with DOF input, review, and approval; b) work with the purchaser and operators to fully utilize the capability of using GIS mapping and GPS receivers in harvesting equipment to minimize the physical layout work needed except in areas where critical habitat or water quality concerns dictate the need for on-the-ground boundary marking.	Noted

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Method of Appraisal	5D.	AP&T	Other considerations that should influence the stumpage price payments to the State are: a) road locations in many cases will be dictated by State needs, not what is most efficient for biomass harvest – this is a distinct benefit to the State and added cost to the purchaser; b) hazardous fuel reduction and wildfire suppression costs (calculated at over $730 per acre based on figures presented on page 19 of the BIF) on State lands will be reduced or avoided – this is a very real savings to the State, as these activities on State lands are not reimbursed by the Federal government; c) this project has the potential to reduce or eliminate the State's PCE payments – another direct benefit to the State.	A. The cost of roads or operational constraints is typically factored into the fair market value of the resource. Where other uses are present they will be expected to pay proportionate to the use. B. Hazard fuel reduction has typically been viewed as a cost. The State has done the majority of its hazard fuels mitigation work through the use of federal grants. The mitigation of hazardous fuels in the Tok area is beyond what would be considered practical from a fuels treatment grant project perspective for a community of its size. The DOF does not have authority to mix the disposal of a resource with procurement of a service. C. Noted.
Method of Appraisal	5D.	Tanacross	"To what degree will the contract bind the State of Alaska to harvest of areas included in the map of Operable State Lands? That is, should biomass harvest be found to no longer serve the best interests of the State of Alaska, perhaps because of unforeseen negative consequences, can the contract be re-negotiated or terminated?"	Due to the pioneering nature of the resource for biomass, a robust exit clause will be part of the contract. An exit clause is typical of all timber sale contracts.

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Method of Appraisal	5D.	Tanacross	Finally, the basis for competitive bidding on the biomass project is not clear. Will it be based on two factors, MCF for round logs and GT for biomass or only on the basis of biomass?	This BIF is based on the premise that biomass is the primary commodity to be sold. It is anticipated that the cost of the biomass may be influenced by the potential recovery of higher value products when saw logs are also present. The sale will be appraised in that light. The DOF will estimate the potential uses of the resource when it prepares the FLUP and determine if it will influence the market value of the stand.
Method of Appraisal	5D.	Stark	The school paid the DOF $2/GT in stumpage for the fuel and incurred a contract cost of $52/GT this spring for delivering it to the school.	Noted.
Method of Appraisal	5D.	YTI	YTI estimates that the timber sale will be a deficit sale if all costs are disclosed. He references AS 38.05.123 as requiring the sale to pay for all costs to the State. He asks who will subsidize this sale? P10-11.	The DOF takes as its highest priority, the sustainability of the forest resources. The foundation of this perspective is awareness of the resource and what is happening with it (timber sale administration). Given the fluctuating funding structure that it works under, the DOF seeks to make the management of timber resources self sustaining across the state. Some sales due to their objectives or restrictions may or may not pay for all of the costs associated with the management of the sale area. The larger the sale, the more it is expected to pay its direct costs to the state. This proposed sale of timber is relatively large and therefore the

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				perspective is to be self sustaining. AS 38.05.123 (a) references a requirement only applicable to that method of sale (Negotiated timber sales for the local manufacture of wood products). The objectives of this sale are varied and not limited to the creation of net income for the State. The State will make specific commitments through the FLUP process for each stand of timber involved in this BIF before it is made part of the timber sale harvest. If it becomes apparent that the costs or risks out way the benefits to the State, the FLUP will change or the contract will be redetermined or terminated. The FLUP and the contract will adapt as the resources, the purchaser's and the State's capability change.

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Method of Appraisal	5D.	YTI	The BIF is lacking in terms of contractual considerations. More information should be provided concerning contract issues and purchaser selection such as: bidder qualifications, needed experience, bidding methods, performance bonding, damage bonding, reforestation responsibility, biomass standards, how will DOF estimate the highest and best use of the products in the area, how will jobs be evaluated in the selection of a purchaser, are jobs and income in a community a priority? And general criteria of a contract and purchaser selection process. P15-16.	The BIF sets out the framework for maintaining the State's best interest. Through AS 38.05 and 41.17 and the tributary regulations, the State approaches the drafting of the timber sale contracts. The majority of the contract requirements are stipulated by 11 AAC 71. The balance of the requirements deemed necessary for maintaining the best interest of the state stem from 11 AAC 95. The DOF will appraise the timber in a manner appropriate to its value. The appraisal will be based on the FLUP. The FLUPs will be developed for areas that operationally and silviculturally are similar in scope and represent the extent of relevant knowledge. Over the lifetime of this proposed sale, multiple FLUPS will be developed. The costs to prepare and apply the FLUP and projected resource values will be the basis of redetermining the contract stumpage. Due to the commercial interest in the sale, the DOF will offer the sale as a competitive sale which is the standard State method of timber sales. As a competitive sale the State will compare competing purchasers based on the highest offered price.
Action Alternatives Considered	VI.		Several people commented that they preferred DOF proceed with negotiated contracts instead of competitive sales.	The preferred Alternative was selected due to competitive interest in the proposed sale and other public comment.

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Action Alternatives Considered	VI.	AP&T	1. I.D. Objectives (page 8): A long term (25 years) contract making biomass available for electrical power generation in Tok is the best opportunity to accomplish all four of the stated objectives. For a project of this size to obtain financing, it will be necessary to have an assured supply of biomass for the financing term (25 years) of the electrical power generation project at a known and predictable rate.	Noted.
Action Alternatives Considered	VI.	AP&T	If it appears that the legislature, during the 2013 session, will make the changes to AS 28.05.118. Negotiated Sales recommended by the Alaska Timber Jobs Task Force, DOF should seriously consider offering two negotiated sales in the Tok area. One sale could be primarily for biomass (as AP&T requested from the State in 2010) and the other for Sawtimber to satisfy the needs of the local sawmill and other forest products industry.	Noted.
Action Alternatives Considered	VI.	Jenkin	"I would like to request that you delay the proposed firewood agreement with Alaska Power And Telephone to provide more time to exam the ramifications of this proposal."	Noted.

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Action Alternatives Considered	VI.	YTI	Requested other options be considered in the analysis of the BIF. Option 1 asserts that his proposal of May 2012 be discussed. Option 2 a stewardship contract be discussed. Option 3 Sell timber in several short term contracts with renewal terms or rebid so as to learn and apply the experiences of the preceding contract. Option 4 "two long term timber sales of approximately the same size, on similar landscape units, and similar locations". P3-4.	The State discussed the options that it believed to be appropriate for the objectives sited in the BIF. As you have outlined other options could be developed. The State is required to develop options that it discerns to be material to the nature of the resource and the limits of statute and regulation. A stewardship contract (similar to what USFS does on federal lands) is not an option. The DOF does not have authority to mix disposal of a resource with procurement of a service. The DOF sells timber as the market demands commensurate with its available resources. Selling timber in contracts lasting 1-2 years occurs presently. The DOF has a defined method for renewal of contracts in 11 AAC 71.205-210 that limits how contracts are renewed. The issuance of the long term contract outlined in this BIF does not preclude another long term contract in the Tok Area. In the June 7, 2012 letter reply to YTI's request for information, the DOF acknowledged another long term contract as being a possibility. The DOF will assess the market and make resources available as conditions allow.

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Action Alternatives Considered	VI.	YTI	To much focus of the document and alternatives focuses on producing electrical power. This appears to be biasing the document towards disposal of the resource for this end product instead other higher value forest products. TYI does not believe he is given fair billing in the document and too much of the document focuses on APT. YTI questions what "equal opportunity means" in the Alternative 2. P 4.	The DOF is required to do what is in the State's best interest. The State endeavors to treat all parties in the public process in an equal manner and works to use the best available information to make decisions. The DOF does not believe it has biased the document. The timber being offered has limited applications due to its size, quality and location thus in itself limiting its likely economic use.
Action Alternatives Considered	VI.	YTI	“Is 25 years needed for amortization?"	The 25 year time frame outlined in the BIF was requested with the original Alaska Power and Telephone sale interest as well as in YTI's statement of interest. The 25 year contract term was also strongly encouraged as a requirement by the Alaska Energy Authority as necessary for financing a CHP facility whether it is though their program or a commercial lending institution. Given the State's utilization objectives, likely use will require the establishment of some type of CHP facility for the utilization of the majority of the timber.
Preliminary Finding and Best Interest Decision	VII.	YTI	"Thus the document is far from objective or neutral; what evidence is there that the decision will be objective, neutral, and comprehensive? The playing field is not level. P16.	The revision of the original BIF was done with the intent of impartiality while acknowledging the increased competitive interest in the State resources in the area.
References	Ref.	Burnside	“The BIF reference for this research work [Ips slash mgmt] – “Burnside” et al on p. 39	Noted.

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			should be updated with correct citation"	
Maps	Maps	ADF&G	Objective 1, Decrease wildland fire risk, page 8: This might be a good place to define more specifically the Tok triangle and the Tok community boundary. The Triangle is variously known to local people as defined on the north and east by highways or by the Tanana and Tok Rivers (the latter boundary doubling its size) and includes settlement lands not part of the annual allowable cut from the Tanana Valley State Forest. Harvest from this area is expected to occur largely before biomass harvest from other state lands, and the management objectives post-harvest are different. The community boundary for hazardous fuel reduction is defined in the context of the CWPP as the Critical zone for fire management (40,837 acres), which should be added to Map V and Map VI or other appropriately-scaled maps.	Reference to the "Tok Triangle" was omitted in the document to avoid confusion. This nomenclature has different meanings to different stakeholders in the area.
Maps	Maps	Tanacross	"Wildfire prevention is the first objective for this competitive sale. The Tok — Tanacross Area Community Wildfire Protection and Biomass Energy Plan of January 2008 shows the location of 39,000 acres of high volume hazardous fuels. This map should be added to the Decision as a guide for harvest area priorities and revised as determined in future revisions of the Community Wildfire Protection and Biomass Energy Plan."	The map of CWPP boundaries has been added as an appendix to the Final BIF.

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Maps	Maps	TVC	"Tetlin Village Council is not listed as an near by land owner. … Tetlin Village Council is a Federally Recognized Tribe that owns approximately 700,000 acres of land."	Tetlin is mentioned in C. Location as a land owner and Map 1 shows Native lands around Tetlin and Tok.
Maps	Maps	TVC	".. there should be a map of the interior trail systems in and immediately adjoin the project area is important in terms of use and cultural resources."	Locally important wildlife research projects and similar location-specific concerns such as trails are typically addressed during public planning and agency participation for the required Five Year Schedule of Timber Sales (FYSTS) and again in the Forest Land Use Plans (FLUPs) that take place prior to harvesting.
Maps	Maps	YTI	"Proposed Timber Sale Area map lacking; (is there blowdown to be harvested? If so it should be noted; if nothing scheduled" it should be noted. Makes suggestions on map titles.P3.	Proposed timber sale areas are only depicted for primary harvest areas. The secondary harvest areas will only be accessed if the primary harvest area volume is insufficient or added if flexibility is needed to meet changing conditions in the area. Map section naming has been changed to coincide with map name.
Other	All	YTI	A number of issues are summarized in YTI Letter of Transmittal that are developed in the accompanied Response Letter. The points summarized are not listed in this matrix in order to minimize duplication.	Noted.

Category	Sec in PBIF	Commenter	Comment	DOF Reply
Other	All	YTI	YTI references submitting a proposal for a long term contract on February 20, 2012. "To date we have not received a formal notification of receipt of our document nor information as to what additional information is desired/requested of YTI/TWFL nor if a special form or format is required." P1.	The DOF responded in writing to YTI on June 7, 2012, on June 20, 2012 and again on September 24, 2012 concerning YTI written proposals and questions or requests for information pertaining to a larger timber sale that might benefit YTI.
Other	All	YTI	YTI asserts that the document was rushed and not well documented and wordy without adequately developing subjects and supplies information on subjects that are not relevant. He also asserts that the information is amateurish. Several examples are cited to make his point that are developed in later more detailed comment sections of his Response Letter. P2.	Noted.
Economics and Market Conditions	5	Burnham	Will the saw logs get cherry picked and the other slash get left on the ground? In other words, will the sale have wording that earmarks a certain amount of the wood has to go to a biomass plant that will somehow benefit Tok.	Standard operating procedure for the DOF is to define utilization standards for the "timber" that is harvested in the timber sale contract. Based on these utilization standards, the purchaser will be required to log and remove the "timber" that meets or exceeds utilization standard. If the purchaser does not remove the specified timber from State land, they will be in breach of the contract; the contract will be used to facilitate a remedy to the situation or it will be terminated. It is up to the purchaser to determine the ultimate use of the timber once it is removed from State

Category	Sec in PBIF	Commenter	Comment	DOF Reply
				land.
Economics and Market Conditions	5	Stark	And I would suggest that the cost of getting the FLUP and all that goes with that so that the APT or Young's can do the deed will be a financial loser for the land owners (us).	Noted. The intent is to recover all DOF costs. The State budget does not presently provide for the perspective of a subsidized sale through underwriting costs.
Economics and Market Conditions	5	Stark	$60 per acre is a steal of a timber sale.	Noted.